Commonwealth of Kentucky Division for Air Quality EXECUTIVE SUMMARY

FINAL
Conditional Major, Operating
Permit: F-07-033
Berea College
Rustic Road, CPO 1913, Berea, KY 40404
October 1, 2007

Permit Writer, Massoud Kayvanjah

SOURCE ID: 21-151-00006

AGENCY INTEREST: 39053

ACTIVITY: APE20070001

SOURCE DESCRIPTION:

Berea College submitted a source renewal application to the Division on May 10, 2007, and supplemental information on June 07, 2007 and July 06, 2007. The facility currently operates under operating permit V-03-005 R2 that will expire on May 13, 2008. Berea has decommissioned or removed two coal-fired units, EP-01 & EP-02 (rated at 107.7 and 71.8 MMBtu/hr) and two natural gas fired units EP-03 & EP-05 (rated at 52.4 and 50.0 MMBtu/hr). Hence, they applied for a federally enforceable permit for non-major source (Conditional Major) instead of Title V renewal permit. The facility is currently operating the two remaining large boilers 18 MMBtu/hr (EU08-01 & 02), each on natural gas with a back up fuel oil, two 6.25 MMBtu/hr (EU06-01 &02), one 1.26 MMBtu/hr (EU-07) and one 0.75 MMBtu/hr (Insignificant Activity NO. 23) all on natural gas. Emission of regulated air pollutants from the boilers are below fifty tons per year; however, the source operates a paint booth that would have an unrestricted potential emissions of volatile organic compounds (VOC) and hazardous air pollutants greater than the Title V major source thresholds. Therefore the facility has requested a source wide annual emissions limit of 90 tons per year for VOC, 9 tons for single HAP, and 22.5 tons for combined HAPs.

PUBLIC AND U.S. EPA REVIEW:

On July 31, 2007 the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Richmond Register* in Richmond, Kentucky. Notification of the issuance of the draft permit was sent to the U.S. EPA on August 14, 2007 via e-mail. The public comment period closed 30 days from the date of publication.

Comments were received from Phillip Valentine, Berea college consultant from Kenvirons, Inc. on August 16, 2007. Attachment A to this document lists the comments received from Kenvirons and the Division's response to each comment.

A notice of a public hearing by was published in the Richmond Register, and the Berea Citizen publication on August 3, 2007. The public hearing was conducted on September 13, 2007 at the Berea City Hall. Comments on the draft permit (F-07-033) were received from Robert Ukeiley (Attorney at Law). Attachment B are extracted comments from the transcript, Attachment C is

tabulated details of the requirements in the permit and Attachment D has articles "PEDIATRCS: Air Pollution and Sudden Infant Syndrome", and "The NEW ENGLAND JOURNAL of MEDICINE: The Effect of Air Pollution on Lung Development from 10 to 18 Years of Age", which was received from the commenter at the hearing.

Changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Attachment A has a detailed explanation of the changes made to the permit.